IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND Greenbelt Division

RoyaltyStat LLC,

Plaintiff, *

*

v. *

IntangibleSpring, Inc., * Case No.: 8:15-cv-03940-GJH

*

and *

* Hon. Paula Xinis

Raul Pacheco Quintanilla, *

*

Defendants.

DECLARATION OF CECIL E. KEY IN SUPPORT OF PLAINTIFF ROYALTYSTAT, LLC'S MOTION IN LIMINE TO EXCLUDE ROYALTYRANGE EVIDENCE

- I, Cecil E. Key, hereby declare as follows:
- 1. I am an attorney at DiMuroGinsberg, P.C., attorney for RoyaltyStat, LLC ("Plaintiff") in the above-captioned litigation. I submit this declaration in support of Plaintiff's Motion In Limine to Exclude RoyaltyRange Evidence, filed on July 6, 2020.
- 2. The statements made herein are based on my personal knowledge and experience. I am over the age of 21, and am competent to testify as to the matters set forth herein.
- 3. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant IntangibleSpring, Inc's Responses to Plaintiff's Third Set of Requests for Production of Documents and Things, dated October 28, 2018, and signed by attorney for Defendants, John Di Giacomo.
- 4. Attached hereto as **Exhibit 2** is a true and correct copy of May 29, 2015 emails from Lukas Balciunas, a RoyaltyRange Senior Consultant, to Ksenia at

asiakovrigina@gmail.com produced by Defendants.

5. Attached hereto as **Exhibit 3** is a true and correct copy of January 4, 2019 notification emails from notifications@logikcull.com to me, Cecil Key, notifying me of the production in this case of Defendants' expert report and associated exhibits on that same date.

Cecil E. Key

DATED: July 6, 2020